

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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RICHARD LeBLANC,

Plaintiff,

v.

UNITED PARCEL SERVICE, INC.,

Defendant.

11 CV 6983 (KPF)

**DECLARATION OF
WALKER G. HARMAN, JR. IN
OPPOSITION TO DEFENDANT'S
MOTION FOR SUMMARY
JUDGMENT**

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WALKER G. HARMAN, JR. declares that the following is true and correct:

1. I am an attorney duly admitted to practice in the United States District Court for the Southern District of New York.
2. I am the principal attorney at The Harman Firm, PC, which represents Plaintiff Richard LeBlanc in the above-captioned action. As such, I am fully familiar with the facts and circumstances of the matter, the basis of my knowledge being the files maintained by our office and time working on the above-captioned action with my office and with Mr. LeBlanc.
3. Attached as *Exhibit A* is a true copy of the Complaint in this action, filed October 5, 2013.
4. Attached as *Exhibit B* is a true copy of the Amended Complaint, filed November 4, 2011.
5. Attached as *Exhibit C* is a true copy of the Affidavit of Dennis Quinn, sworn to October 20, 2011.
6. Attached as *Exhibit D* is a true copy of the Transcript of the Deposition of Mr. LeBlanc, which was taken April 19, 2012.

7. Attached as *Exhibit E* is a true copy of the Transcript of the Deposition of Defendant's witness pursuant to FED. R. CIV. P. 30(b)(6), Beverly Riddick, which was taken February 19, 2013.

8. Attached as *Exhibit F* is a true copy of Transcript of the Deposition of Defendant's witness pursuant to FED. R. CIV. P. 30(b)(6), Christine Rowan, which was also taken February 19, 2013.

9. Attached as *Exhibit G* is a true copy of the Transcript of the Deposition of Defendant's witness pursuant to FED. R. CIV. P. 30(b)(6), Daniel Minesinger, which was taken August 8, 2013.

10. Attached as *Exhibit H* is a true copy of a letter from Harvey M. Kramer, M.D., "strongly recommend[ing] that [Mr. LeBlanc] be transferred to a job with [Defendant] closer to [Mr. LeBlanc's] home," Bates-stamped UPS1408, dated February 12, 2008.

11. Attached as *Exhibit I* is a true copy of UPS's handbook for Employee Dispute Resolution.

12. Attached as *Exhibit J* is a true copy of Mr. LeBlanc's quality performance reviews.

13. I declare under penalty of perjury that the foregoing facts are known by me to be true and correct of my own knowledge.

Dated: New York, New York
October 5, 2013

Respectfully submitted by:
THE HARMAN FIRM, PC
Counsel for Plaintiff

s/
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